



Federal Regulatory Affairs

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March 20, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

On March 18, 2013, Kathleen Q. Abernathy, Executive Vice President, External Affairs; Michael Golob, Senior Vice President, Engineering and Technology and the undersigned of Frontier Communications met with Michael Steffen, Legal Advisor to Chairman Genachowski, and Carol Matthey, Amy Bender and Michael Jacobs of the Wireline Competition Bureau. In the meeting Frontier urged the Commission to commit to the next round of Connect America Fund (“CAF”) Phase I funding and rapidly develop rules in accordance with the recently-filed joint proposals of Frontier and other price cap carriers (“Joint CAF Proposal”).<sup>1</sup> Acting now will ensure that price cap carriers can quickly commence deploying broadband to thousands of unserved locations across America in 2013 while the Commission finalizes Phase II of the CAF.

Frontier explained the cost structures associated with its acceptance of Phase I support in 2012 and its network builds generally. Mr. Golob used the attached diagram<sup>2</sup> to explain Frontier’s broadband network. In doing so Mr. Golob explained the components necessary to upgrade to 4 Mbps download/1 Mbps upload broadband speeds and the costs associated with doing so. Frontier also referenced the attached charts<sup>3</sup> that demonstrate Frontier’s significant commitment to broadband deployment and increasing broadband speeds throughout its territory despite having an average density of only 26 homes per square mile.

Frontier also explained that it believes some of its service areas are being unnecessarily excluded from CAF funding because they show as “served” on the National Broadband Map by Wireless Internet Service Providers (“WISPs”) though broadband service is not actually available. Frontier’s statements were consistent with the WISP issues identified in the Joint CAF Proposal.<sup>4</sup>

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<sup>1</sup> Comments of the United States Telecom Association, the Independent Telephone & Telecommunications Alliance, and the ABC Coalition, WC Docket No. 10-90 (filed January 28, 2013).

<sup>2</sup> See Attachment A.

<sup>3</sup> See Attachment B.

<sup>4</sup> *Id.* at 15-16.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Please feel free to contact me with any further questions.

Sincerely,

A handwritten signature in blue ink, reading "Michael Saperstein, Jr." with a stylized flourish at the end.

Michael D. Saperstein, Jr.  
Vice President, Federal Regulatory Affairs  
Frontier Communications  
(202) 223-6807

cc: Michael Steffen  
Carol Matthey  
Amy Bender  
Mike Jacobs